

Michigan Department of Career Development

Office of Career and Technical Preparation

Size, Scope and Quality

Reimbursement of Expenditures

Supporting the Career Initiative Alignment Grants

Introduction

Beginning with the 2002-2003 Career Initiative Alignment Grant year, subgrants will no longer be allowable for Secondary CTE Perkins and discouraged for Career Preparation. As Tech Prep has never allowed for subgranting, this policy aligned all three initiatives to plan regionally and to carry out the annual activities of each grant through reimbursement of expenditures to participating agencies as opposed to providing subgrants to those same agencies that met the criteria of size, scope and quality.

This document was developed to provide understanding and interpretation of the Carl D. Perkins language regarding the expectation that programs and services supported through the federal funds must be of sufficient size, scope and quality to be effective. Although Career Preparation grants are funded with state aid dollars, all of the CIA grants should consistently meet these definitions in order to fully implement the regional concept and to support the Career Development system.

Activities that an agency within the consortium conducts should be planned on a regional, cooperative basis within the Long Range Plan and Annual Application. Expenses incurred may be reimbursed if the agency activities have been approved by the consortium (CPPAs) and if they meet the scope and quality guidelines.

Definitions

There are many references within the act and within state guidelines that give us direction and definition on applying the concept that is stated so frequently in Perkins.

In Michigan, we have historically distributed Carl D. Perkins federal dollars through consortia arrangements throughout the state. Within our current regional structure (the 25 career preparation planning areas (CPPAs)/workforce development board regions), we continue to use the consortia definition available in the federal law:

(g) consortium arrangements

- (a) To form a consortium or enter into a cooperative agreement with an area vocational and technical education school or educational service agency offering programs that meet the requirements of (the act).

Our definition of an agency that participates in a consortium for Perkins is as follows:

Education agency that has a current, signed agreement with the Perkins fiscal agency to be eligible to participate in Perkins activities and benefit from services afforded under the Perkins Act. The funding amounts generated by the participating agencies in the Perkins formula are combined for the regional allocation.

SIZE

Perkins addresses size of programs through the minimum grant award amount. The grant formula is based on population. Consortia whose enrollment is not enough to generate at least \$15,000 are not of sufficient size to receive a grant. The law also states that the definition of an area vocational/technical education school is a “specialized center or a department in a school that offers programs in no fewer than 5 occupational fields”. We can interpret these parts of the Act to mean that the number of programs and the size of the consortia will determine meeting this criteria. Therefore, all 25 CPPAs are currently eligible to be grant recipients because they meet the definition of size.

SCOPE

Consortia definitions also give us good descriptors of the scope of a program.

(3) Consortium requirements

- a. In general. In order for a consortium of eligible institutions described in paragraph (2) to receive assistance pursuant to such paragraph, such consortium shall operate joint [planning] projects that
 - i. Provide services to all institutions participating in the consortium and
 - ii. Are of sufficient size, scope and quality to be effective.
- b. Funds to consortium. Funds allocated to a consortium formed to meet the requirements of this section shall be used only for purposes and programs that are mutually beneficial to all members of the consortium and shall be used only for programs authorized under this title. Such funds may not be reallocated to individual members of the consortium for purposes or programs benefiting only one member of the consortium.

Two examples of “mutually beneficial” for the consortium (assuming activities were included in the consortium planning) are as follows:

1. Reimbursing a “participating” district for activities needed to raise their Perkins Core Performance Indicator results when that district’s performance has been identified as the reason regional performance did not meet the minimum requirement.
2. Reimbursing a “participating” district(s) for a Regional professional development activity on how to assess/analyze Core Performance Indicator data and use it to drive changes.

Note: In Perkins II, we had High Impact Districts that allowed a certain portion of the Perkins dollars to go directly to certain areas of greatest need. In Perkins III, we no longer have that requirement. Moreover, the last sentence in paragraph b. above clearly prohibits sub-grants within a consortium arrangement, such as we use in Michigan. This language was also within the law in Perkins II.

The scope of a program is also defined through curriculum guidelines so that students gain strong experience in and comprehensive understanding of “All Aspects of the Industry” that students are preparing to enter. Approved programs must include an array of occupations and career that comprise an industry, from the most basic to the most advanced. Curriculum includes principles of technology, labor and community issues, health and safety and environmental issues related to the industry. Students should be able to demonstrate knowledge of the planning, management, finances, technical and production skills for the industry related to the program. Instruction includes emphasis on developing problem-solving skills, include applied academics in the context of the students career pathway selection.

Scope (and even quality) are further defined in the OCTP definition of an approved CTE program:

To be approved and eligible for funding by the State of Michigan, a career and technical education program must be a wage-earning occupational preparation program. A CIP code number and descriptor identify all CTE programs. Career and technical education programs should include classroom and laboratory experiences and work-based instruction. Instruction must be competency-based with either state or national curriculum or, when such curriculum does not exist, locally developed curriculum. The length of a Career and Technical Education program is most often one or two years. The length should be determined based on the complexity of the tasks to be learned for the level of entry into the job market.

QUALITY

This part of the law has received a lot of attention since the implementation of the Core Performance Indicators. Other areas that address quality are:

Each local plan shall

- (5) provide assurances that the eligible recipient will provide a vocational and technical education program that is of such size, scope, and quality to bring about improvement in the quality of vocational and technical education programs;
- (6) describe how the eligible recipient
 - a. will review vocational and technical education programs and identify and adopt strategies to overcome barriers that result in lowering rates of access to or lowering success in the programs for special populations and

And addresses the quality of services for special populations:

- b. And services to special populations will provide programs that are designed to enable the special populations to meet the State adjusted levels of performance.

Projects assisted with funds must be of such size, scope and quality to give reasonable promise of meeting the needs of the students involved.

Office of Civil Rights Compliance, CTE Program Approval and Program Review as well as Follow-Up results are measures of quality that are used by OCTP in addition to those requirements of the Perkins Act. All of these activities provide valuable data regarding the quality of programs and services.

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